

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 6:16-CR-40(01)
	§	(Judge Clark/Love)
HUBERT WRIGHT (01)	§	

**FACTUAL BASIS**

Investigation by the Bureau of Alcohol, Tobacco, Firearms and Explosives, and the Longview Police Department, disclosed the following facts that establish that I, the Defendant, Hubert Wright, violated 21 U.S.C. § 841(a)(1) (Possession with Intent to Distribute approximately 2.4 kilograms of Cocaine), as alleged in Count Eleven of the Indictment, and 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime), as alleged in Count Twelve of the Indictment. I accept the following factual basis as true and correct:

1. On or about May 19, 2016 in Tyler, Smith County, Texas, in the Eastern District of Texas, agents with the Bureau of Alcohol, Tobacco, Firearms and Explosives and officers with the Tyler Police Department executed a search warrant at the defendant's residence located at 508 West 4th Street. The defendant, Hubert Wright was present at the residence at the time the warrant was executed.

2. During the course of the search agents and officers discovered and seized the following items from within the residence:
- a. a Colt Mark IV Pistol, bearing serial number FA13394,
  - b. a Winchester, model 1300, shotgun, bearing serial number L2500690,
  - c. a Mak-90 Sporter Rifle, bearing serial number 94133154,
  - d. a Llama, model Super Comanche, revolver, bearing serial number RA9454, with ammunition,
  - e. an IWI, model Desert Eagle, semi-automatic, pistol, bearing serial number 31205471, with ammunition,
  - f. two semi-automatic pistol magazines with ammunition,
  - g. eight shotgun cartridges,
  - h. semi-automatic rifle magazine with ammunition,
  - i. a semi-automatic pistol box containing a pistol magazine and ammunition,
  - j. a box containing assorted types of ammunition,
  - k. a bag containing assorted types of ammunition,
  - l. assorted types of ammunition,
  - m. \$335,095.00 in U.S. currency
  - n. seven wrist watches in a protective case, a Toshiba, laptop computer, an HP Pavilion, Desktop Computer, model 775e, and a memory card, and/or;
  - o. a night vision firearm accessory, a LG brand cell phone, a Verizon brand cell phone, a currency counter, and a large scale,
  - p. approximately 2,500 grams of a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers

All of the above described cocaine, U.S. Currency, and the loaded, IWI Desert Eagle semi-automatic, pistol, bearing serial number 31205471, were all recovered from a recording studio within the residence. Access to the recording studio, from within the residence, was protected by a metal burglar door which was open when the search warrant was executed. Agents also discovered plates, utensils, plastic bags, digital scales, and a currency counter inside the recording studio.

3. Following the execution of the search warrant, agents and officers transported Wright to the Tyler Police Department where, after being advised of his Miranda rights, Wright voluntarily confessed to knowingly possession the cocaine found in his residence with the intent to distribute same. He also voluntarily confessed the he knowingly possessed the loaded, IWI Desert Eagle semi-automatic, pistol, bearing serial number 31205471, in order to protect himself, his cocaine and his currency from theft.

4. The defendant, Hubert Wright, acknowledges that these facts constitute violations of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) (Possession with Intent to Distribute approximately 2.4 kilograms of Cocaine). as alleged in Count Eleven of the Indictment, and 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime), as alleged in Count Twelve of the Indictment.

Dated: \_\_\_\_\_

1/9/15

Hubert Wright  
HUBERT WRIGHT  
Defendant

**Defendant's Counsel's Signature and Acknowledgment:**

I have read this Factual Basis and the Plea Agreement in this matter and have reviewed them with my client, Hubert Wright. Based upon my discussions with my client, I am satisfied that he understands the terms and effects of the Factual Basis and the Plea Agreement and that he is signing this Factual Basis voluntarily.

Dated: 1/9/17

R. Kelly Pace  
R. KELLY PACE  
Attorney for Defendant